

2018 AUG 15 PM 2:34

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

**AND CLERK'S OFFICE
AT GREENBELT**

UNITED STATES OF AMERICA

V.

PATRICK LAWRENCE WOOD,

Defendant

CRIMINAL NO. 5JH 18cr429

(Conspiracy to Produce Child Pornography, 18 U.S.C. §§ 2251(e); Receipt of Child Pornography, 18 U.S.C. § 2252A(a)(2); Possession of Child Pornography, 18 U.S.C. § 2252A(a)(5)(B); Forfeiture, 18 U.S.C. § 2253, 21 U.S.C. § 853, 28 U.S.C. § 2461(c))

* * * * *

INDICTMENT

COUNT ONE

(Conspiracy to Produce Child Pornography)

The Grand Jury for the District of Maryland charges that:

At all times relevant to this Indictment:

1. **PATRICK LAWRENCE WOOD** was a resident of Silver Spring, Maryland.
2. **Co-conspirator A** was a resident of the Philippines.

The Conspiracy

3. Between no later than on or about July 18, 2018 and on or about July 27, 2018, in

the District of Maryland and elsewhere, the Defendant,

PATRICK LAWRENCE WOOD.

did knowingly and willfully combine, conspire, confederate and agree with **Co-conspirator A** and with others known and unknown to the Grand Jury to employ, use, persuade, induce, entice, and coerce a minor to engage in any sexually explicit conduct as defined in Title 18, United

States Code, Section 2256(2), for the purpose of producing a visual depiction of such conduct, and the visual depiction had been produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, in violation of 18 U.S.C. § 2251(a).

Manner and Means of the Conspiracy

4. It was part of the conspiracy that **WOOD** and **Co-conspirator A** communicated directly via Facebook private messenger service.

5. It was further part of the conspiracy that **WOOD** requested and **Co-conspirator A** sent, via Facebook private messenger, images of Victim 1, a minor female, engaged in sexually explicit conduct.

6. It was further part of the conspiracy that **WOOD** requested, through **Co-conspirator A**, that Victim 1 perform specific sex acts.

7. It was further part of the conspiracy that **WOOD** requested, through **Co-conspirator A**, that the requested sex acts performed by Victim 1 be recorded and sent to **WOOD** by **Co-conspirator A** via Facebook private messenger.

Overt Acts

8. In furtherance of the conspiracy, and to effect the objects thereof, **WOOD**, **Co-conspirator A**, and others known and unknown to the Grand Jury, committed the following acts:

A. In or about July 2018, **WOOD** communicated with **Co-conspirator A** regarding Victim 1 via Facebook private messenger.

B. In or about July 2018, **WOOD** requested an image from **Co-conspirator A** depicting Victim 1 engaged in sexually explicit conduct.

C. On or about July 19, 2018, **WOOD** communicated via Facebook private messenger with **Co-conspirator A**, and asked that **Co-conspirator A** send an image of Victim 1 engaged in sexually explicit conduct, asking specifically “Can she open it for me.”

D. On or about July 19, 2018, **Co-conspirator A** sent an image via Facebook private messenger to **WOOD** depicting Victim 1 exposing her genitals.

E. On or about July 19, 2018, **WOOD** communicated via Facebook private messenger with **Co-conspirator A**, after receiving the image of Victim 1 exposing her genitals, and asked **Co-conspirator A**, “can she open like she did no cam” and “if I come there can I fuck her.”

18 U.S.C. § 2251(e)

COUNT TWO
(Receipt of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about July 18, 2018, in the District of Maryland and elsewhere, the Defendant,

PATRICK LAWRENCE WOOD,

knowingly received child pornography and materials that contain child pornography, as defined in Title 18, United States Code, Section 2256(8), to wit, a video of Victim 2, a minor male, engaged in sexually explicit conduct, that had been mailed, shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer.

18 U.S.C. § 2252A(a)(2)

COUNT THREE
(Possession of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about July 27, 2018, in the District of Maryland and elsewhere, the Defendant,

PATRICK LAWRENCE WOOD,

knowingly possessed any material that contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), which image had been mailed, shipped, and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

18 U.S.C. §§ 2252A(a)(5)(B)

FORFEITURE ALLEGATION

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Federal Rule of Criminal Procedure 32.2, notice is hereby given to the Defendant that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. § 2253, 21 U.S.C. § 853, and 28 U.S.C. § 2461(c), as a result of the Defendant's convictions under Counts One through Three of this Indictment.

2. Pursuant to Title 18, United States Code, Section 2253, upon conviction of the offenses set forth in Counts One through Three of this Indictment, in violation of Title 18, United States Code, Sections 2251 and 2252A, the Defendant,

PATRICK LAWRENCE WOOD,

shall forfeit to the United States of America:

a. Any visual depiction described in Title 18, United States Code, Section 2251 or 2252A, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Chapter 110;

b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses; and

c. Any property, real or personal, used or intended to be used to commit or to promote the commission of the offenses.

Substitute Assets

3. If any of the property described above, as a result of any act or omission of the

Defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b).

18 U.S.C. § 2253

21 U.S.C. § 853

28 U.S.C. § 2461(c)

Robert K. Hur ^{ITFH}

Robert K. Hur
United States Attorney

A TRUE BILL:

SIGNATURE REDACTED

Foreperson

August 15, 2018
Date